UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re: \$ Chapter 11

FIELDWOOD ENERGY III LLC, et al., \$ Case No. 20-33948 (MI)

\$ (Jointly Administered)

Post-Effective Date Debtors.

§

STIPULATION AND AGREED ORDER ADJOURNING HEARING DATE ON OBJECTION TO CLAIM OF ITC GLOBAL, INC.

The administrator of the chapter 11 plan (the "<u>Plan Administrator</u>") of the above-captioned reorganized debtors (collectively, the "<u>Debtors</u>," as applicable, and after the effective date of their plan of reorganization, the "<u>Post-Effective Date Debtors</u>") and ITC Global, Inc. (the "<u>Claimant</u>," and together with the Plan Administrator, the "<u>Parties</u>") hereby stipulate and agree as follows:

WHEREAS, on January 6, 2022, the Plan Administrator filed that certain *Plan Administrator's Objection Pursuant to Section 502(b) of the Bankruptcy Code to Claim Number 831 Filed by ITC Global, Inc.* [Docket No. 2333] (the "Objection"), which seeks the disallowance of Claim No. 831 filed against the Debtors by the Claimant, all as more fully set forth in the Objection;

¹ The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor's federal tax identification number, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the "Post-Effective Date FWE I Subsidiaries") are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

WHEREAS, on January 27, 2022, the Parties filed the Stipulation and Agreed Order

Extending Response Deadline to Claim Objection and Adjourning Hearing Date [Docket No.

2354] (the "Initial Stipulation"), which sought the agreed adjournment of the hearing (the

"Hearing") on the Objection to March 2, 2022 at 10:00 a.m. (Central Time) and the agreed

adjournment of Claimant's deadline to object or otherwise respond to the Objection to February

25, 2022;

WHEREAS, on January 28, 2022, the Court approved the Initial Stipulation [Docket No.

2364];

WHEREAS, on February 25, 2022, Claimant filed that certain ITC Global, Inc.'s

Response to Debtor's Objection to Claim [Docket No. 2399]; and

WHEREAS, the Parties have agreed, subject to approval of this Court and after conferring

with the Court's Case Manager, to adjourn the Hearing to discuss the potential of a consensual

resolution of the Objection.

NOW, THEREFORE, IT IS STIPULATED AND AGREED TO BY THE PARTIES, AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS SO

ORDERED AS FOLLOWS:

1. The above recitals are incorporated by reference herein with the same force and

effect as if fully set forth hereinafter.

2. The Hearing shall be adjourned to **April 4, 2022 at 10:00 a.m.** (**Central Time**).

Dated:

Honorable Marvin Isgur

United States Bankruptcy Judge

AGREED AS TO FORM AND CONTENT:

Dated: February 28, 2022

BY:<u>/s/ Michael D. Warner</u>

Michael D. Warner, Esq. (TX Bar No. 00792304) Benjamin L. Wallen, Esq. (TX Bar No. 24102623) PACHULSKI STANG ZIEHL & JONES LLP 440 Louisiana Street, Suite 900

Houston, TX 77002 Telephone: (713) 691-9385 mwarner@pszjlaw.com bwallen@pszjlaw.com

-and-

Gabriel Sasson, Esq. (Admitted *pro hac vice*) John F. Iaffaldano, Esq. (Admitted *pro hac vice*) STROOCK & STROOCK & LAVAN LLP

180 Maiden Lane
New York, NY 10038

Telephone: (212) 806-5400 gsasson@stroock.com jiaffaldano@stroock.com

Counsel for the Plan Administrator

Dated: February 28, 2022

BY:__/s/ Lloyd Lim_____

Lloyd Lim, Esq.

KEAN MILLER LLP

711 Louisiana Street, Suite 1800 South Tower Houston, TX 77002 Telephone: (713) 844-3070 lloyd.lim@keanmiller.com

Counsel for ITC Global, Inc.